

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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|---------------------------------|---|---------------------|
| REED C. DEMPSEY, and SHELLEY | : | |
| DEMPSEY, | : | |
| | : | |
| Plaintiffs, | : | |
| | : | |
| v. | : | |
| | : | |
| BUCKNELL UNIVERSITY, JOHN | : | |
| C. BRAVMAN, LEWIS A. MARARRA, | : | |
| DANIEL C. REMLEY, AMY A. BADAL, | : | |
| LINDA LOCHER, KARI M. CONRAD, | : | |
| MICHAEL SMYER, CHIEF JASON | : | |
| FRIEDBURG, OFFICER JULIE | : | JURY TRIAL DEMANDED |
| HOLTZAPPLE, OFFICER DARRELL | : | |
| FISHER, OFFICER ROBERT ULMER, | : | |
| OFFICER JAMES MIDDLETON, | : | NO.: 4:11-cv-1679 |
| OFFICER JED RISHEL, DETECTIVE | : | |
| JEFFREY ETTINGER, CAPTAIN | : | |
| DOUGLAS LAUVER, and ANTHONY J. | : | |
| VOCI, JR., | : | |
| | : | |
| Defendants | : | ELECTRONIC FILING |

**MOTION FOR SUMMARY JUDGMENT
OF DEFENDANT, ANTHONY J. VOCI, JR.**

The Defendant, Anthony J. Voci, Jr., by and through his counsel, The Perry Law Firm, LLC, hereby requests this Court to enter summary judgment in his favor pursuant to Fed. R. Civ. P. 56(b) on all counts remaining against Moving Defendant

in the Complaint. Moving Defendant incorporates by reference his concurrently filed Statement of Uncontested Material Facts, and his supporting Brief and exhibits attached thereto to be filed in accordance with M.D. Pa. Local Rule 7.5.

Moving Defendant in this action is an Attorney against whom Plaintiff alleges claims of defamation, tortious interference with a contract, and intentional infliction of emotional distress in connection with the Attorney's representation of his client in a criminal action against Plaintiff. Because there is no genuine dispute as to any material fact concerning the claims against Moving Defendant and because it is clear that a reasonable person would view all statements and actions taken by Attorney Voci as nothing more than zealous and proper representation and protection of the interests of his client rather than as an attempt to defame, humiliate, shock or scar Plaintiff; prevent his graduation from Bucknell University; or cause him to suffer physical or psychological harm, Moving Defendant's Motion should be granted.

Counsel for Plaintiff has been contacted concerning this Motion and does not concur with this Motion.

A proposed order is attached.

WHEREFORE, Defendant, Anthony J. Voci, Jr., respectfully requests that this Court enter judgment in his favor and dismiss all claims against Defendant with prejudice.

Respectfully submitted:

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